

IN THE CIRCUIT COURT OF HENRY COUNTY, MISSOURI
CLINTON, MISSOURI
CIRCUIT DIVISION

2010 NOV -5 PM 3:47

CIRCUIT CLERK
HENRY COUNTY
CLINTON, MISSOURI

ROSS E. LAWRENCE
and
DEBBIE K. LAWRENCE,

Plaintiffs,

vs.

PROPERTY AND CASUALTY
INSURANCE COMPANY OF HARTFORD

Defendant.

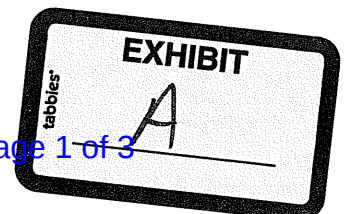
Case No. 10HE-CC-00103

Please Serve:
Director of Insurance
301 West High Street – Room 530
Jefferson City, Missouri 65102

**PLAINTIFFS' PETITION ON UNINSURED MOTORIST POLICY
AGAINST PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD**

Comes now plaintiffs and for their cause of action against Property and Casualty Insurance Company of Hartford state that:

1. On November 10, 2008 an unknown vehicle struck Ross Lawrence.
2. The collision took place in Jefferson City, Cole County, Missouri.
3. The collision was a direct result of the negligence of the unknown vehicle in that:
 - (a) It failed to keep a careful lookout.
 - (b) It drove at an excessive speed.
 - (c) It failed to yield the right-of-way.
4. As a direct result of the negligence of the unknown vehicle, Ross Lawrence suffered injuries to his back, neck, and whole body, including strains and contusions about his back, a direct result of which he has suffered and will continue to suffer medical and other healthcare expenses, pain, suffering, anxiety, disability, emotional and psychological injuries, disfigurement, and loss of enjoyment of the ordinary activities of daily life.



5. Debbie Lawrence is the lawful spouse of Ross Lawrence.

6. As a direct result of the negligence of the unknown vehicle, Debbie Lawrence has suffered, and will continue to suffer, loss of the valuable services, support, consortium, society, companionship, assistance with household chores, care, love, comfort, and affection of Ross Lawrence.

7. Property and Casualty Insurance Company of Hartford is a foreign corporation in good standing in the State of Missouri, and is now, and was at all times mentioned in this petition, authorized to do business in and to sue and to be sued in the State of Missouri.

8. This cause of action accrued on November 10, 2008.


9. Before November 10, 2008, in consideration of the payment of a stated premium, Property and Casualty Insurance Company of Hartford made and issued to Ross Lawrence and Debbie Lawrence three policies of automobile insurance, said policies applying during and throughout the period of November 10, 2008; each policy of insurance providing uninsured motorist coverage of \$50,000.00 per person and \$100,000.00 per accident whereby Property and Casualty Insurance Company of Hartford agreed to pay all sums in which Ross Lawrence and Debbie Lawrence are legally entitled to recover as damages from the owner or operator of an uninsured motor vehicle because of bodily injuries sustained by Ross Lawrence and loss of consortium sustained by Debbie Lawrence. The policy was issued under No. 55 PHH333221 and insured three vehicles, a 1973 MG Midget Classic, a 2002 Ford F-150, and a 1999 Toyota RAV4.

10. Each policy of insurance stacks to provide uninsured motorist coverage to its policy limits of \$150,000.00 for each person for \$300,000.00 per accident.

11. Ross Lawrence and Debbie Lawrence have, in all respects, complied with the terms and conditions of the policy of insurance and have previously provided Property and Casualty Insurance Company of Hartford notice of their loss.

WHEREFORE, plaintiffs pray for judgment against Property and Casualty Insurance Company of Hartford for \$150,000.00 plus any pre-judgment interest if demand was made pursuant to §408.020 and §408.040, plus costs, and for such other orders this court deems just and proper.


POAGUE, WALL, COX & ADAMS, LLC


JEFFERY T. ADAMS
Missouri Bar No. 42550
116 West Jefferson
P.O. Box 226
Clinton, Missouri 64735
Telephone: (660) 885-2221
Facsimile: (816) 817-1840
Email: jadams@pwcawlaw.com
Attorney for Plaintiffs

Ross E. Lawrence and Debbie K. Lawrence, duly sworn upon their oath, states that they are the plaintiffs, and that the facts contained in their Petition on Uninsured Motorist Policy Against Property and Casualty Insurance Company of Hartford are true and correct according to the best of their knowledge and belief.



Ross E. Lawrence



Debbie K. Lawrence

STATE OF MISSOURI)
)§
COUNTY OF HENRY)

On this 4th day of November, 2010, before me personally appeared Ross E. Lawrence and Debbie K. Lawrence, to me known to be the persons described in and who executed the foregoing document, and acknowledged to me that they executed the same as their free act and deed and for the purposes therein stated.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal, the day and year last above written.



NOTARY PUBLIC

My Commission Expires:

